

Wendy Stevens
PartyLite Candles
June 2, 2006

Dear Sir or Madam:

I am writing this letter because I am VERY concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a PartyLite Consultant. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell PartyLite products.

I have been a PartyLite Consultant for more than 12 years. Originally, I became a Consultant with PartyLite because I felt the products were exceptional, and I wanted to earn some additional income. My greatest joy is to help people decorate their homes with the beauty of candlelight, and create an atmosphere of peace and serenity for a family to come home to. Over the years, I have also experienced much satisfaction and excitement, as I watch new consultants gain confidence, and personal growth as well as earn an income that allows many moms to stay home and raise their own children while still being able to supplement their families income. The future of these families is dependent on the stability of the Direct Selling Industry.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new consultants. PartyLite's Sales kit is FREE to a new Consultant when she has a \$350 Starter Show. People buy TV's, cars, and other items that cost much more and they do NOT have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because PartyLite already has a 100% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep VERY detailed records when I first speak to someone about PartyLite, and will then need to send in many reports to my company headquarters.

The proposed rule also calls for the release of *any* information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It doesn't matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does NOT make sense to me that I would have to disclose these lawsuits unless PartyLite is found guilty. Otherwise, PartyLite and I are put at an unfair advantage even though PartyLite has done *nothing* wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I would be glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their consent) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other

companies or businesses – including those of competitors. It is not in the interest any direct seller to give that kind of information to someone who may use it for their own gain. In order to get the list for the 10 prior purchasers, I will need to send the address of the prospective purchaser to PartyLite headquarters, and then wait for the list to be returned to me. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson – “If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers.” People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met. I certainly would not want my own personal information used in this way, and I’m sure most other people wouldn’t either.

I appreciate the work that the FTC does to protect consumers, but I believe this proposed new rule has many unintended consequences and there are much less burdensome alternatives available to achieving your goals.

Thank you for your time and consideration.

Respectfully,

Wendy Stevens
PartyLite Consultant

cc: PartyLite Home Office